

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

	X	
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<b>In re</b>	:	<b>Chapter 11</b>
	:	
<b>TERRAFORM LABS PTE. LTD.,</b>	:	<b>Case No. 24–10070 (BLS)</b>
	:	
<b>Debtor.<sup>1</sup></b>	:	<b>Re: Docket No. 155</b>
	:	
	X	

**CERTIFICATION OF COUNSEL REGARDING REVISED  
PROPOSED ORDER AUTHORIZING DEBTOR TO EMPLOY AND RETAIN  
RAHMAN RAVELLI SOLICITORS AS SPECIAL FOREIGN COUNSEL TO  
TERRAFORM LABS PTE. LTD., EFFECTIVE AS OF THE PETITION DATE**

The undersigned hereby certifies as follows:

1. On March 7, 2024, Terraform Labs Pte. Ltd., as debtor and debtor in possession in the above-captioned chapter 11 case (the “**Debtor**”), filed the *Application of Debtor for Authority to Employ and Retain Rahman Ravelli Solicitors as Special Foreign Counsel to Terraform Labs Pte. Ltd., Effective as of the Petition Date* [Docket No. 155] (the “**Application**”)<sup>2</sup> with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). Attached to the Application as Exhibit C was a proposed form of order granting the relief sought therein (the “**Proposed Order**”).

2. Pursuant to the *Notice of Application and Hearing* that was attached to the Application, objections to the relief sought in the Application, if any, were to be filed by no later than March 21, 2024 at 4:00 p.m. (ET) (the “**Objection Deadline**”). The Objection Deadline was

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<sup>1</sup> The Debtor’s principal office is located at 1 Wallich Street, #37-01, Guoco Tower, Singapore 078881.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Application.

extended for the Office of the United States Trustee for the District of Delaware (the “**U.S. Trustee**”).

3. Prior to the Objection Deadline, the Debtor received certain informal comments (the “**Comments**”) to the Proposed Order and the relief requested in the Application from the U.S. Trustee. Other than the Comments, the Debtor received no other informal responses to the Application, and no objection or responsive pleading to the Application has appeared on the Court’s docket in this chapter 11 case.

4. The Debtor has revised the Proposed Order (the “**Revised Order**”) to resolve the Comments. A copy of the Revised Order is attached hereto as **Exhibit 1**. For the convenience of the Court and all parties in interest, a blackline of the Revised Order marked against the Proposed Order is attached hereto as **Exhibit 2**.

WHEREFORE, the Debtor respectfully requests that the Revised Order, substantially in the form attached hereto as **Exhibit 1**, be entered at the earliest convenience of the Court.

Dated: April 3, 2024  
Wilmington, Delaware

/s/ Matthew P. Milana

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